

3.22 Transportation and Traffic

This section describes the environmental setting for traffic and transportation, as well as potential environmental impacts and associated mitigation measures under the Proposed Project. The discussions in the following subsections focus primarily on regional and local roadways that provide access to Proposed Project facilities, traffic safety and road conditions, as well as public transit and non-motorized travel. Impacts evaluated herein focus primarily on the increased construction-related activities that the Proposed Project would create regarding traffic and transportation. While this section considers the sporadic activities that would occur throughout this period, the transportation and traffic focus is on the four- to six-month period during the peak of the construction-related activity, when removal activity would occur concurrently at each of the three California dams. Once the construction-related activity is completed, there will be no additional traffic generated by or directly related to the Proposed Project.

The State Water Board received a comment expressing safety concerns about Copco Road's serving as the primary access route to the Copco No. 1 Dam area and about the potential impacts of construction activities and traffic on the safety of other road users, including school busses, residents, pedestrians, livestock and dogs. The commenter expressed concern that Copco Road could be damaged during construction activities. The State Water Board did not receive other comments related to transportation and traffic and service systems during the NOP public scoping process (see Appendix A).

3.22.1 Area of Analysis

The Area of Analysis for transportation and traffic includes roadways in Siskiyou County, California, that would be used by construction vehicles and workers for, and could potentially be affected by, the Proposed Project. The Area of Analysis includes major access roads from Interstate 5 easterly to where Ager Beswick Road crosses the Oregon border. These roads are generally rural with low-density development. Most of the surrounding private property outside of the Proposed Project is undeveloped or used as grazing land for cattle, with the exception of several small communities in the vicinity of Copco No. 1 and Iron Gate reservoirs. Figure 3.22-1 depicts California roadways within the Area of Analysis for transportation and traffic that are analyzed in this chapter, and excludes other local roads that feed into this network because those local roads would not be used for transportation of construction equipment or workers and would not be affected by the Proposed Project. The portion of Interstate 5 that may be affected by the Proposed Project is only partially depicted in Figure 3.22-1, but it is fully analyzed herein.

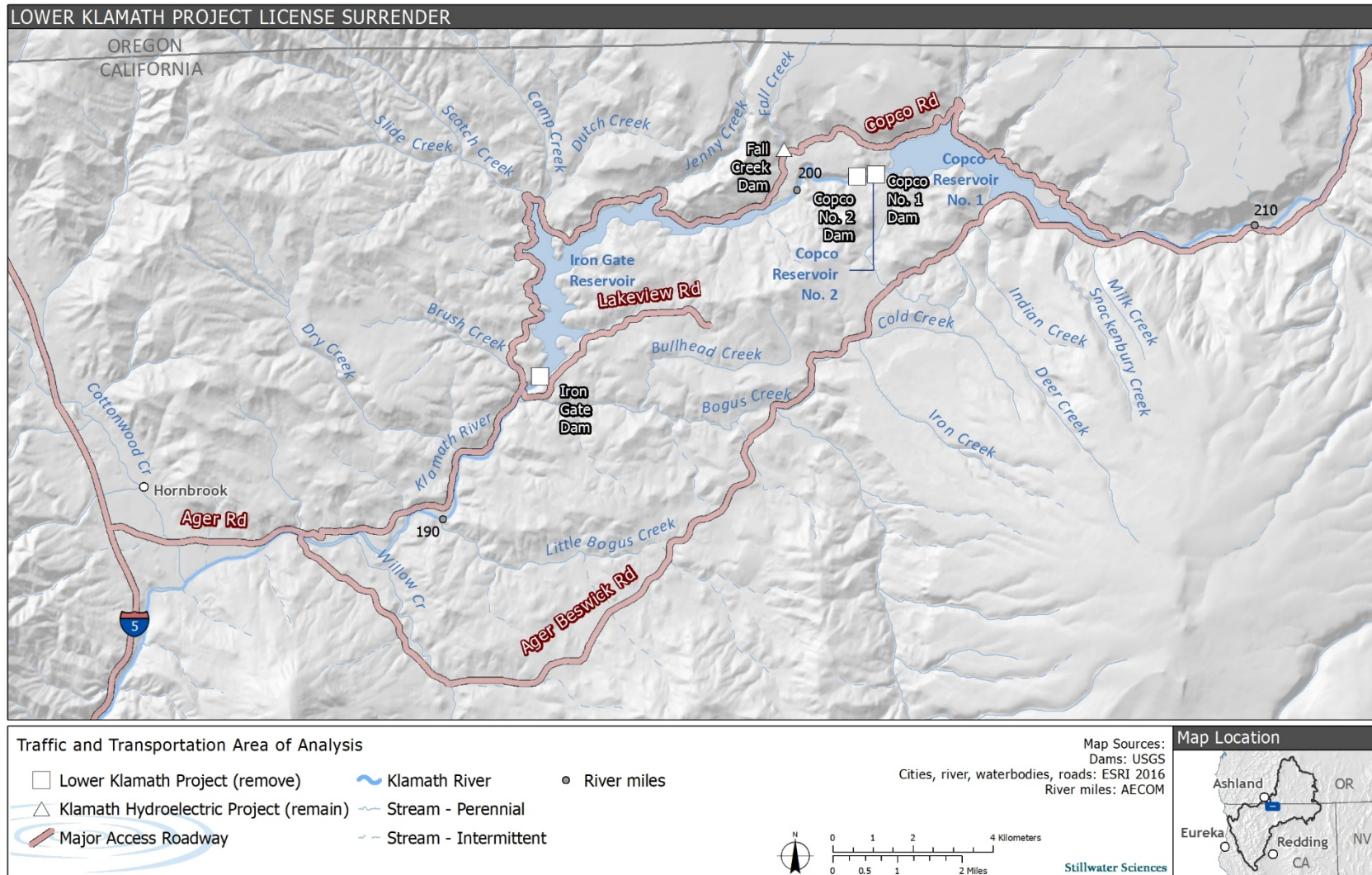


Figure 3.22-1. Traffic and Transportation Area of Analysis.

Table 3.22-1 lists the dam sites within the Area of Analysis for transportation and traffic, along with the corresponding regional and local roads that access each site. Under the Proposed Project, equipment hauling and waste disposal for J.C. Boyle Dam would occur only in Oregon (Appendix B: *Definite Plan*) and so traffic impacts associated with J.C. Boyle Dam are not analyzed herein.

Table 3.22-1. Major Local and Regional Access Roads within the Traffic and Transportation Area of Analysis.

Dam Site	Interstate Access Road	Regional Access Road	Local Access Road
Copco No. 1	I-5 (in California)	Copco Road	Ager-Beswick Road
Copco No. 2	I-5 (in California)	Copco Road	Ager-Beswick Road
Iron Gate	I-5 (in California)	Copco Road	Lakeview Road

3.22.2 Environmental Setting

This section describes the environmental setting associated with transportation and traffic within the Area of Analysis. For discussion of other related environmental resources areas, see Sections 3.9 *Air Quality*, 3.10 *Greenhouse Gas Emissions*, 3.14 *Land Use and Planning*, 3.17 *Public Services* and 3.21 *Hazards and Hazardous Materials*.

3.22.2.1 Traffic Flow

Roadways

Roadways in the Area of Analysis for transportation and traffic are classified as principal arterials, major collectors, minor collectors, and rural local roads. These roadway classifications are defined by the Siskiyou County Local Transportation Commission as follows:

- Principal arterials constitute routes whose design provides for high overall travel speeds with minimum interference to through movement. These routes serve long distance movements indicative of statewide or interstate travel. Principal arterials provide an integrated network that connects communities, regions, and other states.
- Major collectors provide service to larger towns not directly served by the arterial system, and to other traffic generators of equivalent intra-county importance, such as major recreational areas, schools, airports, and commercial activity centers. Additionally, they link these locations with nearby larger towns or cities and with higher classification routes.
- Minor collectors provide service to the remaining smaller communities within the county and link the locally important traffic generators with these rural areas.
- Rural local roads primarily provide access to adjacent land, and provide travel over relatively short distances as compared to arterials and collectors. Local roads constitute the remaining roadway mileage not classified as principal arterial, minor arterial, or collector roadways in Siskiyou County.

Primary access routes in the Area of Analysis for transportation and traffic that are likely to be affected by Proposed Project-related traffic are listed below and shown in Table 3.22-1 and Figure 3.22-1, above.

A discussion of road ownership and maintenance responsibilities is included in Section 3.14 *Land Use and Planning* (see also Figure 3.14-2).

Interstate 5 (I-5) is a major north/south interstate highway (principal arterial) that runs the length of California and is owned/maintained by Caltrans. This is a main regional access road for project facilities. I-5 is approximately 8 miles west of Iron Gate Dam. I-5 has four lanes through Siskiyou County. I-5 would be utilized for mobilization of construction equipment and as a haul route for carrying exported demolition materials. The alignment and pavement is in very good condition (Appendix B: *Definite Plan*). It would also serve as a route for workers commuting to the Proposed Project. Caltrans (2018a) traffic volume data from 2016 indicate that I-5 at Henley Way/Copco Rd (Exit 789) had 20,900 Annual Average Daily Traffic (AADT) in its peak month, and averaged 17,200 AADT.

Copco Road, some portions of which may be identified as “Juniper Road,” “Ager Road,” or “Iron Gate Lake Road” in some maps or documents, is a county-owned two-lane major collector in Siskiyou County that runs from I-5 to its intersection with Ager Road, where it then becomes a minor collector for the remainder of its length (Fehr and Peers 2011). Copco Road runs east from I-5 to Iron Gate Dam, where it turns north and parallels Iron Gate Reservoir to the Klamath River. From this point, Copco Road parallels the northern side of the Klamath River and Copco No. 1 Reservoir. Copco Road provides primary access to both Copco No. 1 and Copco No. 2 dams. Copco Road is a paved, two-lane road in generally good pavement condition between I-5 and Ager Road with few pavement cracks or ruts and is approximately 27 feet wide. Copco Road maintains this character from its intersection with I-5 east to a point about 10 miles from Copco No. 2 dam, near the Juniper Point Picnic Area. The condition of other portions of Copco Road are poorer than the segment between I-5 and Ager Road. For example, the section between the intersection of Copco Road with Ager Road and the Juniper Point Picnic Area contains intermittent pavement surfacing that has not been as well maintained as the portions to the west of Ager Road. (Additional information regarding the condition of roads in the vicinity of the Proposed Project is available in Appendix B: *Definite Plan – Appendix K*.) The final three miles, from Camp Creek Road near the Juniper Point Picnic Area to Copco No. 1 dam, are gravel and narrow, and less than 18 feet wide in some locations. The posted speed limit on Copco Road from I-5 to the Juniper Point Picnic Area is generally 55 mph with a few sharp curves, especially in the portions that run along the Iron Gate Reservoir. Posted speed limit is then reduced to 35 mph. Copco Road would be a primary access and hauling route for carrying exported demolition materials and for workers commuting to construction areas.

Roadways that could be accessed from Copco Road toward the Proposed Project include Ager Road, Ager-Beswick Road, Lakeview Road, Fall Creek Road, and other two-lane roads that provide access to residential and recreational areas. Copco Road, at its intersection with Ager Road, has approximately 485 AADT; Copco Road near Iron Gate Dam has approximately 216 AADT (Fehr and Peers 2011). Roadways described below connect to these road segments. Many sections of the local roads are posted for 25-35 mph or do not have posted speed limits.

Ager Road is a two-lane major county-owned collector that intersects Copco Road approximately three miles east of I-5 (Fehr and Peers 2011). Ager Road travels south to an intersection with Ager-Beswick Road.

Ager-Beswick Road is a county-owned two-lane minor collector that runs along the southern side of the Klamath River (Fehr and Peers 2011). It is accessed from Ager Road east of the downstream end of the Proposed Project or via a one-lane bridge that crosses from Copco Road over Copco No. 1 Reservoir at the upstream (easterly) end of the Proposed Project.

Lakeview Road is a rural local road that accesses Iron Gate Dam. Lakeview Road intersects with Copco Road at the entrance to the Iron Gate Recreation Area. A one-lane bridge crosses the river at this intersection, linking it to Lakeview Road. Lakeview Road is a gravel road that leads up to the top of Iron Gate Dam. It is approximately 24 feet wide and has a steep embankment on the east side, without a guardrail. Lakeview Road connects to an unnamed bridge access road. The narrow, gravel access road leads onto the top of Iron Gate Dam. For the purposes this analysis, Lakeview Road would be considered an unpaved access road except when discussing the bridge.

Fall Creek Road is a rural local road that intersects with Copco Road and provides access to Fall Creek Dam.

Unpaved access roads include a small network of one-lane, gravel access roads leading from Copco Road to each of the dams. These roads, the majority of which are owned by PacifiCorp, are no wider than 15 feet and are no longer than half a mile. Most of the traffic along these roads consists of PacifiCorp's technicians accessing the facilities, recreational users, or local residents. See Figure 2.7-2 and Appendix B: *Definite Plan – Appendix K* for additional details on locations and conditions of these roads.

Regional Transportation Plan

The Siskiyou County Local Transportation Commission (SCLTC) is the designated Regional Transportation Planning Agency for Siskiyou County. The County is within the jurisdictional boundaries of California Department of Transportation (Caltrans) District 2, located in Redding. The SCLTC, along with Caltrans District 2, fulfills the transportation planning responsibilities for Siskiyou County. One of the main responsibilities of the SCLTC is the preparation and approval of the Regional Transportation Plan. The 2016 Regional Transportation Plan serves as the planning blueprint to guide transportation investments in Siskiyou County involving local, state, and federal funding over the next twenty years. This assures that proper planning for traffic flow, including assessing road conditions and multimodal transportation needs, is implemented.

The 2016 Regional Transportation Plan includes:

- A Policy Element (Chapter 3) describing the transportation issues in the region, identifies and quantifies regional needs expressed within both a short- and long-range framework, and maintains internal consistency with the financial element fund estimates.
- An Action Element (Chapter 4) that identifies plans to address the needs and issues for each transportation mode in accordance with the policy element.

- A Financial Element (Chapter 5) that identifies the current and anticipated revenue sources and financing techniques available to fund the planned transportation investments describes in the action element. The intent is to define realistic financing constraints and opportunities.

The County's Regional Transportation Plan incorporates a number of local and state planning efforts to implement the County's policy to support the development and maintenance of an efficient, safe and effective road system. The 2016 Regional Transportation Plan incorporated information from the following plans and studies.

- Siskiyou County Regional Transportation Plan (2010)
- Siskiyou County Circulation Element Goals (1988)
- Siskiyou County General Plan (1988)
- Ten-Year State Highway Operation and Protection Plan (SHOPP Plan) (2015)
- Siskiyou County Unmet Transit Needs (2015)
- STIP Fund Estimate, CTC (Jan 2016)
- California Strategic Highway Safety Plan (2015)
- Siskiyou County Coordinated Public Transit-Human Services Transportation Plan (2014)

Level of Service

Operation of the roadway system typically is described in terms of Level of Service (LOS). LOS is a quantitative indication of the level of delay and congestion experienced by motorists. LOS is designated by the letters "A" through "F." LOS A corresponds to the lowest level of congestion, where individuals are virtually unaffected by the traffic stream, and LOS F corresponds to the highest level of congestion and the forced breakdown of flow.

The 2016 Siskiyou County Transportation Plan (Greendot 2016) provides AADT thresholds for general classes of roadways and projected volumes from the present to the year 2035. By comparing AADT for measured roads within the Area of Analysis for transportation and traffic with the capacities of those roadways, Greendot (2016) indicates acceptable LOS determinations for those roadways (Table 3.22-2).

Table 3.22-2. Maximum Daily Volume Thresholds for Roadway Classes.

Classification	Level of Service (LOS)* (vehicle trips)				
	A	B	C	D	E
4-Lane Major Freeway	25,400	41,600	58,400	71,000	79,200
2-Lane, Class I Highway	1,200	3,700	7,600	13,600	21,000
2-Lane, Class II Highway	1,700	4,100	8,200	16,600	21,200
Rural Principal Arterial (2 lane)	2,600	5,900	10,300	16,900	20,200
Rural Minor Arterial (2 lane)	1,200	3,300	6,400	11,000	15,500
Rural Major Collector (2 lane)	1,300	3,900	7,500	12,600	16,900
Rural Minor Collector (2 lane)	1000	3,000	5,500	8,750	11,200
Rural Local Road	600	2,000	3,500	4,900	5,500

* Based on the 2010 Highway Capacity Manual, which provided maximum peak hour flows. The values in this table were converted to daily travel using the peak period percent (approximately 10 percent) for these facilities (Greendot 2016).

Conditions on I-5 are at LOS A, which represents free flow. The major access roadways in the Area of Analysis that are likely to be affected by Project-related traffic are at LOS A most of the time (Greendot 2016), with occasional delays expected from high recreational traffic on particular days (e.g., Memorial Day, Fourth of July), and seasonal delays from road conditions (e.g., ice and downed trees).

3.22.2.2 Traffic Safety

Road widths, surface materials, vehicle speed limits, etc., are discussed briefly in Section 3.22.2.1 *Traffic Flow*. Additional information in Appendix B: *Definite Plan – Appendix K* includes an evaluation of sight stopping distance, intersection and roadway geometry, and road conditions. Google Earth Street View (2018), as well as county transportation planning documents that discuss road conditions, traffic accident data, etc. (Greendot 2016; Fehrs and Peers 2011) were also incorporated into the evaluation of traffic safety. The delivery of off-road construction equipment, including cranes, large excavators, loaders, and large capacity dump trucks would be by special tractor-trailer vehicles operating under “wide load” restrictions and at appropriate speeds. Intersection and infrastructure field observations are included in Appendix B: *Definite Plan – Appendix K*.

3.22.2.3 Road Conditions

The existing roads in the transportation and traffic Area of Analysis are owned by PacifiCorp, the Federal Government, Siskiyou County or private entities (Figure 3.14-2). PacifiCorp is currently responsible for maintaining approximately 14.5 miles of roads within lands it owns. Transfer of PacifiCorp land, including roads, within the Parcel B lands would be to the State of California or a designated third-party transferee (see also Section 2.7.10 *Land Disposition and Transfer*).

Roads (including bridges and culverts) in the traffic and transportation Area of Analysis have been utilized to provide rural residential and extensive recreational uses. Roadways originally may have been built for the construction and management of the dams and reservoirs and appear to have served adequately for that purpose (see Appendix B: *Definite Plan – Section 7.4 and Appendix K*). However, the conditions of the roadways at the time that the dam removal activity is proposed are dependent on what road maintenance activities occur between now and then. According to Appendix B: *Definite Plan – Section 7.4 and Appendix K*, several roads (including bridges and culverts) near the Lower Klamath Project dam facilities are currently inadequate (narrow lanes, bridges of varying conditions, culverts that may be undermined). Recent (2017) surveys have identified the roadways, bridges, and culverts that may require improvements over their current conditions in order to withstand construction-related traffic under the Proposed Project. These roadways, bridges, and culverts are listed below.

Road and Bridge Improvements/Replacements

- Copco Road from I-5 to Ager Road—some pavement rehabilitation.
- Copco Road from Ager Road to Lakeview Road—poor condition, some pavement rehabilitation.
- Copco Road Bridge – potential erosion protection to abutments/ pier.

- Dry Creek Bridge—to be replaced, strengthened or provided with a temporary crossing.
- Copco Road between Lakeview Road and Daggett Road—poor condition, some pavement rehabilitation.
- Jenny Creek Bridge—to be replaced post-construction.
- Copco Road from Daggett Road to Copco Access Road—some road surface rehabilitation during construction.
- Fall Creek Bridge—to be replaced.
- Copco Access Road—grading and clearing required.
- Barge Access to Copco Lake—minor access improvements for barge/crane, boat ramp extension.
- Ager Beswick Road—minor access improvements for barge/crane, boat ramp extension at Mallard Cove.
- Daggett Road—some road surface rehabilitation during construction.
- Daggett Road Bridge—to be replaced, strengthened or provided with a temporary crossing.
- Lakeview Road between Copco Road and Disposal Site—some road surface rehabilitation during construction.
- Lakeview Road Bridge—to be replaced, strengthened or provided with a temporary crossing.
- Powerhouse Access Road—some road surface rehabilitation during construction
- Upstream Left Abutment Access Road—to be re-established then reclaimed post-construction.
- Access Road from Long Gulch Recreational Facility to Lakeview Road - some road surface rehabilitation during construction.
- Access Road from Overlook Point Recreational Facility to Copco Road - some road surface rehabilitation during construction.

Culvert Replacements

- Copco Road at Beaver Creek, East Fork Beaver Creek, Raymond Gulch, West Fork Unnamed Creek, Scotch Creek, 200 feet east of Scotch Creek, small cross-culverts between Brush Creek And Scotch Creek, Camp Creek
- Patricia Avenue at East and West Forks Unnamed Creek
- Deer Creek
- Indian Creek
- Daggett Road at Fall Creek

The proposed improvements to existing roads, bridges and culverts to support short-term construction activities are described in more detail in the following Appendix B: *Definite Plan* locations:

- *Sections 5.2.2, 5.3.2, 5.4.2 and 5.5.2* discuss construction access assessments and related transportation improvements and maintenance.
- *Section 7.4 and specifically Table 7.4.1* describes post-construction transportation improvements and maintenance.

- *Appendix K* contains specifics of the road infrastructure assessment.

The KRRC proposes to develop final designs for planned road, bridge, and culvert improvements during the detailed design phase or as part of a contractor bid document for the Proposed Project (Appendix B: *Definite Plan*). Development of final designs would enable agencies that must approve road, bridge, and culvert improvements to determine the necessity and scope of additional environmental review of those improvements.

3.22.2.4 Emergency Access

The location of the Proposed Project is generally rural, with limited access to vehicular emergency services. As such, rural users realize that response times for emergency access are much longer than in more urban settings. Sections 3.21 *Hazards and Hazardous Materials* and 3.17 *Public Services* of this EIR describe the actual service providers and ability to respond; the Traffic and Transportation analysis is limited to accessibility by emergency service vehicles.

Most roads that already experience truck traffic for hauling boat trailers or other large vehicles/equipment are generally adequate for emergency vehicle use, as has occurred in the past. Roads with residences or farms have experienced construction-sized vehicles and equipment for construction and maintenance. Emergency response times are affected by weather, road conditions, and the amount of other traffic using the road system at the same time. Existing limitations on bridge width and conditions may also affect emergency access and response times.

3.22.2.5 Public Transit

Transit Service

Siskiyou Transit and General Express (STAGE) is the county's public transit service provider. STAGE is the only regional service that connects the downtown areas of Dunsmuir, Weed, Mt. Shasta, Grenada, McCloud, Yreka, Montague, Fort Jones, Greenview, Etna, Klamath River, Horse Creek, Hamburg, Seiad Valley, and Happy Camp. See Table 3.22-3 for destination information. Service is very limited, sometimes running only one or two times a week. The Hornbrook route branches into the Area of Analysis for traffic and transportation and, as of 2016, runs twice a week. The Hornbrook route follows I-5 north into Hornbrook, turns east on Copco Road, and then turns south (before reaching Iron Gate Dam) at Ager Road, heading towards Montague.

In addition, Greyhound Lines provides service within the region in Weed, near the College of the Siskiyous. This location is accessible via the STAGE bus transit service. As with STAGE, this service is limited and is along a major U.S. highway.

Table 3.22-3. Siskiyou Transportation and General Express Routes (STAGE).

STAGE Routes	Destinations
Northbound I-5	Dunsmuir, McCloud, Mt. Shasta, Weed, Gazelle, Grenada, Cove Trailer Park, Yreka
Southbound I-5	Yreka, Cove Trailer Park, Grenada, Gazelle, Weed, Mt. Shasta, Dunsmuir
Montague/Scott Valley/Hornbrook	Yreka, Montague, Hornbrook, Scott Valley (Fort Jones, Etna)
Lake Shastina	Weed, Mt. Shasta, Dunsmuir, Lake Shastina
Happy Camp/Orleans	Yreka
Yreka Northbound	Various destinations within Yreka, Karuk
Yreka Southbound	Various destinations within Yreka, Karuk

Source: Greendot 2016

Air Transportation

Siskiyou County operates five public use, general aviation airports: Butte Valley, Happy Camp, Scott Valley, Weed, and Siskiyou County. A private emergency medic flight service operates between Medford, Oregon and Redding, California. In addition, United Parcel Service (UPS) Ground and Air Freight Services are available at the Montague/Yreka Rohrer Field and the Dunsmuir Municipal Airport. Each airport is owned and operated by its respective city. The Siskiyou County Airport, located in Shasta Valley—11 miles east of Yreka—is home to a USDA Forest Service Fire Attack Base in the summer months (Greendot 2016). The closest public airport is Siskiyou County Airport, which is more than 10 miles south of Iron Gate Dam in Montague. No private or public airport or airfield is within two miles of the Proposed Project.

Rail Transportation

The rail line in Siskiyou County has been dormant from Weed to Oregon since 2008, yet remains historically significant. The rail line follows the Sacramento River and I-5 through the California Central Valley, Shasta and Siskiyou Counties, and into Oregon. Recent grants have allowed for rehabilitation and repair projects for sections of the track. Reopening the track will create additional transportation options for lumber and manufacturing goods from Oregon, which will subsequently result in decreased truck use to transport goods. The rail line is an important historic and cultural attraction in Dunsmuir where the rail line is actively used for passenger travel through Amtrak. Near the rail line in Dunsmuir, the Railroad Resort offers a hotel, restaurant, and museum in vintage train cars.

Amtrak provides rail service in Dunsmuir and Klamath Falls; both are stops along the “Coast Starlight” route, which connects Vancouver, BC, to San Diego, CA. Several stations along the “Coast Starlight” route provide a bus and rail connection to Amtrak’s nationwide network. The Dunsmuir Amtrak station is accessible via the STAGE bus transit service.

3.22.2.6 Non-Motorized Transportation

The road system briefly described in Section 3.22.2.1 *Traffic Flow* has a varying but relatively rare amount of non-motorized use compared to motorized use,. However, it is anticipated that there could be occasional non-motorized commute and recreational uses on the thoroughfares and localized use by residents and recreators on local roads

close to all three dam facilities. Similar to motorized traffic, non-motorized transportation would be subject to seasonal fluctuations based on weather, occupation of residences, and seasonal activities including resource utilization and school sessions. Other recreational uses such as motorized and non-motorized boating are discussed in Section 3.20 *Recreation*.

3.22.3 Significance Criteria

Criteria for determining significance on transportation and traffic is informed by Appendix G of the CEQA Guidelines (California Code of Regulations, title 14, section 15000 et seq.) and based on professional judgment. Effects on transportation and traffic are considered significant if the Proposed Project would result in one or more of the following:

1. Substantial increase in traffic where substantial is defined as a quantity in excess of the capacity or design of the road improvement or impairs the safety or performance of the circulation system, including transit, roadways, bicycle lanes or pedestrian paths.
2. Substantial conflict with an applicable congestion management program, including, but not limited to LOS and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways that would result in an increased risk of harm to the public.
3. Substantial increase in hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment) that would result in an increased risk of harm to the public.
4. Result in inadequate emergency access that would result in harm to the public.
5. Substantially conflict with public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities that would result in an increased risk of harm to the public.
6. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.

3.22.4 Impact Analysis Approach

The approach to impact analysis for transportation and traffic evaluates the existing transportation circulation within the Area of Analysis for comparison with projected circulation under the Proposed Project. The impact analysis for transportation and traffic focuses on short-term construction-related activities, which generally include the pre-construction period, the dam removal period (up to two years), and one to five years after dam removal, where the latter includes the majority of anticipated restoration and monitoring activities (Appendix B: *Definite Plan*). While this section considers the sporadic activities that would occur throughout this period, the transportation and traffic impact analysis focuses on the six-month period during the peak of the construction-related activity, when concurrent activity would occur in the removal of the three California dams and compares this to the summertime peak recreational activity that is currently occurring. Once the construction-related activity is completed there will be no traffic generated directly related to the Proposed Project. Therefore long-term impacts, those occurring after the construction-related activities are completed, were considered to be less than significant when roads and other infrastructure are left in a condition equal or better than pre-project.

The transportation analysis considers the increase in traffic related to these short-term construction activities and the potential conflicts with residents and property owners in the area, as well as any recreational or visitor traffic that may occur during the activity period. This analysis also considers school bus traffic. The majority of the dam removal activity is proposed in May through September (Table 2.7-1), when, for the majority of the time, school is not in session. The transportation analysis considers the capacity and design of the roads used during activity times.

The Proposed Project addresses such factors as traffic management, emergency response, fire management, structural analysis of the integrity of the roads, bridges and culverts and implementation of required improvements prior to and after construction activities (Appendix B: *Definite Plan* –Appendix O). These factors are all an integral part of analyzing the potential for transportation impacts associated with the construction-related activities as well as after the completion of the Proposed Project. Additional related analysis is also found in other sections of the EIR, as listed in Table 3.22-4.

Table 3.22-4. Transportation-related Discussion Found Elsewhere in this EIR.

Transportation Issues	Section No.	Topic(s)
Vehicle Emissions	3.9	Air Quality
Greenhouse Gas Emissions	3.10	Greenhouse Gas Emissions
Community Connectivity	3.14	Land Use and Planning
Emergency Response	3.17	Public Services
Emergency Response	3.21	Hazards and Hazardous Materials

The Siskiyou County Local Transportation Commission (SCLTC) is the designated Regional Transportation Planning Agency for Siskiyou County. The County is within the jurisdictional boundaries of California Department of Transportation (Caltrans) District 2, located in Redding. The SCLTC, along with Caltrans District 2, fulfills the transportation planning responsibilities for Siskiyou County. As noted in the Siskiyou County Regional Transportation Plan the primary local and regional issues continue to revolve around a lack of maintenance funding to maintain the integrity of existing facilities. A major concern for Siskiyou County is the continuing maintenance requirements of the existing road system. Delayed projects and the lack of funding results in additional deterioration of already poor pavement quality, higher costs due to inflation, and more expensive rehabilitation and reconstruction costs. (Greendot 2016). Chapter 3 of the Regional Transportation Plan contains objectives and policies to meet the specified goals in the Regional Transportation Plan. In addition, the major goal and objective of the Land Use and Circulation element of the County's general plan is "to protect the county's critical natural resources and still allow room for adequate growth and development. The Proposed Project would not conflict with the measures set forth in the Regional Transportation Plan or with the goal and objective of the Land Use and Circulation element of the County's general plan. The Regional Transportation Plan does not contain measures or programs that would conflict with the Proposed Project in a manner that would adversely affect the environment.

3.22.5 Potential Impacts and Mitigation

Potential Impact 3.22-1 Proposed construction-related traffic could potentially result in a substantial increase in traffic in excess of the capacity or design of the road improvements or impairs the safety or performance of the circulation system, including transit, roadways, bicycle lanes or pedestrian paths

Potential Impact 3.22-2 Proposed construction-related traffic could potentially conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures or other standards established by the county congestion management agency for designated roads or highways that would result in increased risk of harm to the public.

The below analysis applies for both Potential Impacts 3.22-1 and 3.22-2.

As described in Section 3.22.2.1 *Traffic Flow*, roadways that would be utilized for dam removal activities are generally narrow, rural roads that have been used primarily for a small amount of residential use and the existing seasonal recreational use demand associated with the reservoirs.

Short-term impacts to local roads would be primarily limited to the pre-construction period, the dam removal period (May through September of the drawdown year; Table 2.7-1) and one to five years after dam removal during restoration and monitoring activities. The pre-construction and dam removal period would include the import and export of materials and equipment, as well as the construction workforce associated with all the elements of the Proposed Project. Dam removal itself would result in the highest projected construction intensity under the Proposed Project, and thus the greatest workforce and number of associated vehicle trips. Table 3.22-5 presents the projected size of the dam removal workforce that would be commuting daily to the site, and the duration of the activity for each of the dams, presented as both an average and a peak value. The size of the construction workforce at each site would vary, and the peak times for construction would be staggered across sites.

Table 3.22-5. Workforce Projections for Dam Removal for the Proposed Project.

Dam	Estimated Construction Workforce	Duration	Estimated Peak Workforce	Peak Period
J.C. Boyle*	30 people	9 months	45 people	Jun–Sep dam removal year 2
Copco No. 1	35 people	12 months	55 people	Apr–Nov dam removal year 2
Copco No. 2	30 people	6 months	40 people	Apr–Sept dam removal year 2
Iron Gate	40 people	10 months	80 people	Jun–Sep dam removal year 2

* J.C. Boyle Dam is included in this analysis as some of the traffic flow may use roads in California (e.g., I-5 to OR 66)

Source: Appendix B: *Definite Plan – Section 5*

Based on Table 3.22-5, the Proposed Project creates the greatest traffic-related impacts due to construction occurring at three or more dam sites simultaneously. For instance, while only the Copco No. 1 Dam is proposed to begin removal activities for the last two

months of Year 1, concurrent activity at four dams is projected for six months (April-September) with an average workforce 135 people and peak activity occurring for four months (June-September) with a 220-person peak workforce. If just considering the three California dams, concurrent activity is projected with an average workforce of 105 people and peak activity workforce of 175 people. These numbers would equate to one-way trips to or from the Proposed Project. If construction schedules shift, projections of traffic impacts may also shift, however, there would likely be times of concurrent activities regardless of small shifts in the Proposed Project schedule.

Because recreational facilities at the reservoirs would be closed during the construction period, this analysis assumes that traffic associated with recreational use of the reservoirs would cease during the construction period. When the additional traffic flow from the short-term concurrent activities associated with dam removal is compared to the current traffic flow for recreational use of the reservoirs, the workforce traffic is similar to the current recreational use traffic. FERC (2007) identified the total annual recreational days for both Copco No.1 (8,850 days) and Iron Gate (51,795 days) reservoirs. If the recreational use were to be evenly distributed throughout a year, then there would be a total of 166 “recreational uses,” or trips per day, at recreational facilities within the Proposed Project area. There is no information on the peak number of recreational trips from recreational use, however it is likely that recreational use peaks during summer months. If it is assumed that peak recreational trips are double the average, the peak number would be 332 trips per day. Using the more conservative (for the purpose of comparison of effects) assumption that peak recreational trips are 20 percent greater than the average, the peak number would be approximately 199 trips per day. It is also assumed that recreational use peaks between June and September, which coincides with the proposed peak workforce months for construction activity. Based on these assumptions and the average and peak numbers of the construction workforce set forth in Table 3.22-5, traffic flow during the dam removal period would be similar to what occurs currently for recreational uses (166 average trips and 199 peak trips for recreational use, and 105 average and 175 peak trips per day for dam removal). With the closure of reservoir recreational facilities during construction activities, the average number of daily workforce trips is expected to be less than the average daily reservoir-related recreational trips during Project construction.

Recreational use trips associated with recreation at areas within the Area of Analysis other than Copco No. 1 and Iron Gate reservoirs may still occur during construction periods, but because Copco No. 1 and Iron Gate facilities would be closed, it is expected that continued recreational use traffic would be dispersed away from the immediate vicinity of Copco No. 1 and Iron Gate and would not overlap with construction traffic. Additional discussion of alternative recreational opportunities is described in Section 3.20 *Recreation*.

Additionally, under the Proposed Project, estimated vehicle trips for imported materials and waste disposal would generate a short-term increase in traffic volumes (Table 3.22-6). The short-term construction-related import and export of materials and equipment combined with workforce-related vehicle trips added to the existing AADT would be lower than the existing road capacities listed in Table 3.22-2. It is also possible that, depending on the contractors that are selected to undertake the construction work for each of the Lower Klamath Project dams, there may be overlap of work crews and equipment movement between the three California dams and J.C. Boyle Dam in Oregon. Some traffic from J.C. Boyle Dam construction activities may enter California, increasing

the number of estimated vehicle trips noted in Table 3.22-6, but any estimate of either of these examples would be speculative.

Table 3.22-6. Vehicle Trips (VT) for the Import/Export of Materials for the Proposed Project*.

Dam	Estimated VT Imported	Estimated VT Exported	Total VT	Peak Duration	VT per Day
Copco No. 1	1,720	706	2,426	7 months	15
Copco No. 2	Included in Copco No. 1 VT estimates	1,928	1,928+	6 months	14
Iron Gate	380	746	1,126	4 months	12
J.C. Boyle	200	1,024	1,224	4 months	13

* VT numbers consider both full and empty returns.

Source: Appendix B: *Definite Plan – Section 5, revised* (S. Leonard, AECOM as KRRRC Technical Representative, pers. comm., November 2018).

As noted in Section 3.22.2.1 *Traffic Flow*, the two major roads used for access would be Interstate 5 and Copco Road. Copco Road has an ADT of 485 and a LOS A capacity of 1300 ADT. Adding 391 ADT from both worker trips (350 ADT) and waste movement (41 ADT), Copco Road would remain at a LOS A. Likewise for Interstate 5, with an AADT of 20,900 and LOS A capacity of 25,400 AADT, there is sufficient capacity for added traffic (391 ADT) to keep the LOS level at LOS A. These short-term additional trips would cease after the Proposed Project is completed.

The period between one and five years after dam removal, associated with restoration and monitoring activities, would also involve an increased level of traffic but this would be less than existing recreational traffic and minor in comparison to traffic occurring during pre-construction and dam removal activities.

The long-term effects of the Proposed Project would include a reduction in overall recreational use of the reservoirs and associated traffic, along with the potential for a minor increase in associated traffic for river-associated recreational use, such as river kayaking and fishing. Given the decrease in traffic related to the reduction of reservoir-associated recreational use, the small increase in river-associated recreational use would be less than significant, as discussed in more detail in Section 3.20 *Recreation*.

With the low amount of current residential and recreational uses, the existing roads, bridges and culverts may have served adequately in the past; however, expanded use, such as from proposed construction-related activities related to deconstruction of the dam facilities, though it may be for a short period, would require additional evaluation, according to Appendix B: *Definite Plan – Section 7.4*. Roadways, bridges, and culverts that may require improvements over their current conditions in order to withstand construction-related traffic under the Proposed Project are listed in Section 3.22.2.3 *Road Conditions*. The Proposed Project would include improvement of these facilities to a level that would enable them to accommodate traffic associated with the Proposed Project without being degraded below baseline conditions. Final designs for planned improvements would be developed during the detailed design phase or as part of a contractor bid document for the Proposed Project, and would inform decisionmakers regarding the necessity and scope of additional environmental review. In addition, the discussion of impacts and mitigation measures set forth in this EIR, including Mitigation Measures WQ-1, TER-1, TER-2, TER-3, TCR-1, TCR-2, TCR-3, TCR-4, and HZ-1,

would assist those decisionmakers in determining how the impacts of road improvements can be mitigated.

Finally, as noted above, the Proposed Project would not conflict with the measures set forth in the Regional Transportation Plan or with the goal and objective of the Land Use and Circulation element of the County's general plan does not contain measures or programs that would conflict with the Proposed Project in a manner that would adversely affect the environment.

Overall, additional traffic related to pre-construction activities, dam removal, waste transportation, restoration and monitoring activities, and planned improvements to existing roads, bridges and culverts under the Proposed Project would replace, and be similar to existing recreational use levels and thus would not have substantial, short-term impacts on the LOS in the Area of Analysis. However the proposed activities could result in impairing the safety or performance of the circulation system for all users, resulting in a potentially substantial risk of harm to the public.

The Proposed Project includes a draft Traffic Management Plan (Traffic Management Plan) that identifies the key requirements that would be incorporated by the construction contractor into a final Traffic Management Plan. According to Appendix B: *Definite Plan – Appendix O2*, the Traffic Management Plan is a specialized program tailored to minimize impacts by applying a variety of techniques such as *Public Information, Motorist Information, Incident Management and Construction Strategies*. The major objectives of the Traffic Management Plan are to maintain efficient and safe movement of vehicles through the construction zone covered by activities in the Definite Plan and to provide public awareness of potential impacts to traffic on both haul routes and access roads to the four dam complexes. The Traffic Management Plan outlines the structure and key requirements that would be incorporated by the KRRC's contractor into a final Traffic Management Plan. The final Traffic Management Plan would be informed by KRRC's contractor's specific means and methods for construction, which could refine the approach to access and traffic management. KRRC proposes that the final Traffic Management Plan would meet applicable regulatory permit requirements, as well as applicable state and local ordinances, as appropriate. In addition, as described in Potential Impact 3.22-4, KRRC will also be finalizing an Emergency Response Plan, which is integrally related to the Traffic Management Plan. As such these two plans are discussed together below.

The Traffic Management Plan would be further developed by KRRC working with the appropriate agencies through the FERC process. Additional details to be added to the final Traffic Management Plan and Emergency Response Plan would include those items listed in the draft Traffic Management Plan and Emergency Response Plan (Appendix B: *Definite Plan – Appendix O2 and O4*). KRRC also proposes that KRRC and the appropriate state and local agencies would work together to develop recommended terms and conditions that should be adopted by FERC as conditions of approval for the Lower Klamath Project. This is consistent with FERC's preference for licensees to be "good citizens" of the communities in which projects are located and thus to comply, where possible, with state and local requirements.

It would be appropriate for the recommended terms and conditions relating to traffic and transportation in the final Traffic Management Plan and Emergency Response Plan to provide implementation details consistent with all applicable regulatory permit

requirements including the latest version of the Caltrans California Manual on Uniform Traffic Control Devices (Caltrans 2018b) and be coordinated with the noted agencies (Caltrans, Siskiyou County, California Highway Patrol, CALFIRE, and other emergency response agencies) as part of the detailed design phase and prior to start of construction. Recommended Measure TR-1 includes additional and feasible components beyond those listed as part of the Proposed Project that would reduce potential short-term construction-related impacts on performance of the circulation system and congestion. However, overseeing development and implementation of the final Traffic Management Plan and Emergency Response Plan does not fall within the scope of the State Water Board's water quality certification authority. While the KRRC has stated its intention to reach enforceable "good citizen" agreements that will be finalized and implemented, at this time the Traffic Management Plan and Emergency Response Plan are not finalized and the State Water Board cannot require their implementation. Accordingly, the State Water Board anticipates that implementation of the final Traffic Management Plan and Emergency Response Plan, including the aforementioned additional details and any modifications developed through the FERC process that provide the same or better level of protection for transportation and traffic, would be expected to ensure that impacts are lowered to less than significant. Because the State Water Board cannot ensure the Traffic Management Plan's and Emergency Response Plan's implementation, it has determined the impact in this Draft EIR to be significant and unavoidable.

Recommended Measure TR-1 - Transportation and Traffic.

- A. The KRRC and/or its contractor(s) shall develop a final Traffic Management Plan that provides:
1. Implementation details consistent with all applicable regulatory requirements including the latest version of the Caltrans California Manual on Uniform Traffic Control Devices (Caltrans 2018b) and coordination with the noted agencies (Caltrans, Siskiyou County Public Works and Sheriff's Departments, California Highway Patrol, CALFIRE, and other emergency response agencies) as part of the detailed design phase and prior to start of construction. Potential conflicts with bicycle and pedestrian use, as well as transit and school bus service, need to be addressed in the Traffic Management Plan. The final version of the Traffic Management Plan, after coordination with the above referenced agencies, shall be received by the State Water Board prior to the start of construction.
 2. Each road, bridge, and culvert improvement project included in the Proposed Project, or any other road, bridge, or culvert improvement project that is identified as necessary for the Proposed Project, shall be constructed consistent with the latest version of the Caltrans Highway Design Manual (Caltrans 2018c) or equivalent, and shall not conflict with any applicable plan, ordinance, or policy regarding performance of the transportation system, traffic safety and/or congestion management within the Area of Analysis. Construction shall not begin until all final designs for road, bridge, and culvert improvement projects included in the Proposed Project have been received and approved, as necessary, by the county and other responsible agencies.
 3. The KRRC shall be responsible for repairing and/or rehabilitating any Siskiyou County roadways within the traffic and transportation Area of Analysis that are damaged or otherwise adversely impacted by Proposed

Project activities, such that they are in a condition equal to or better than they were before dam removal activities.

- B. The KRRC and/or its construction contractor(s) shall develop an Emergency Response Plan with details and procedures to be put in place to help prevent incidents, to ensure preparedness in the event incidents occur, and to provide a systematic and orderly response to emergencies through coordination with emergency response agencies, as described in Appendix B: *Definite Plan – Appendix O4*.

Significance

Significant and unavoidable impact

Potential Impact 3.22-3 Proposed construction-related traffic could result in substantially increasing hazards due to a design feature (e.g., sharp curves or narrow lanes) or incompatible uses (e.g., oversized construction equipment) that would result in an increased risk of harm to the public.

Roads, bridges, and culverts in the transportation and traffic Area of Analysis currently serve rural residential and extensive recreational uses (Section 3.22.2.3 *Road Conditions*). Some of the roadways originally may have been built for the construction of the Lower Klamath Project dams and appear to have served adequately for that purpose. However, the existing conditions of the roadways and other infrastructure are not adequate for all of the construction activities included in the Proposed Project, as described in Appendix B: *Definite Plan – Appendix K*. As described in Impacts 3.22-1 and 3.22-2, the improvements may include five bridges (two of them over the Klamath River) that need to be replaced: four bridges for construction purposes, and one bridge post-construction because it is built on reservoir sediment. There are 13 or more culverts that need replacement. As described in Appendix B: *Definite Plan – Appendix K*, there are portions of 20.3 miles of road that would need partial road improvements. Some descriptions note that sections of roads are in poor condition but no improvements are proposed. These sections of roads may not be up to a standard for the transportation of construction equipment, adequate for emergency response, or in a condition adequate for future use after dam removal activities have been completed.

The Proposed Project includes general information regarding planned improvements to existing roads, bridges, and culverts to support short-term construction activities. While the general information suggests that none of the road, bridge, and culvert improvement projects would substantially increase traffic or transportation hazards due to a design feature or incompatible use, it notes that details of each improvement would be developed during the detailed design phase or as part of a contractor bid document for the Proposed Project (Appendix B: *Definite Plan*). The draft Traffic Management Plan (Appendix B: *Definite Plan – Appendix O2*) further notes that the KRRC's contractor would perform a risk assessment of all intersections and roadways as part of the final Traffic Management Plan.

Implementation of Recommended Measure TR-1 would require additional components beyond those listed as part of the Proposed Project (i.e., the final versions of the Traffic Management Plan and Emergency Response Plan) and these components would be necessary to reduce potential traffic and transportation hazards due to a design feature or incompatible uses to less than significant. Overseeing development and implementation of the final Traffic Management Plan and Emergency Response Plan,

including measures described in Recommended Measure TR-1, does not fall within the scope of the State Water Board's water quality certification authority. While the KRRC has stated its intention to reach enforceable "good citizen" agreements that will be finalized and implemented, at this time the Traffic Management Plan and Emergency Response Plan are not finalized and the State Water Board cannot require their implementation. Accordingly, the State Water Board anticipates that implementation of the final Traffic Management Plan and Emergency Response Plan, including the aforementioned additional details in Recommended Measure TR-1 and any modifications developed through the FERC process that provide the same or better level of protection for transportation and traffic would be expected to ensure that impacts to less than significant. However, because the State Water Board cannot ensure implementation of the final Traffic Management Plan and Emergency Response Plan, it has determined the impact in this Draft EIR to be significant and unavoidable.

Significance

Significant and unavoidable impact

Potential Impact 3.22-4 The Proposed Project could result in inadequate emergency access that would result in harm to the public.

The analysis of adequate emergency response considers the needs for emergency access related to dam removal activities, as well as concurrent emergency access for residents and property owners in the area. An example of inadequate emergency access would be a delay that might occur from a fire truck traveling in the opposite direction of large construction equipment, or an ambulance responding to a traffic accident at the time that construction workers are traveling to the work site.

Under the Proposed Project, the types of emergency vehicles would be similar to the types of vehicles currently using roadways, and the construction activities and schedule (Table 2.7-1) would provide a similar degree, but different type, of vehicular traffic within the Area of Analysis that is beyond current traffic levels and types. The peak of construction-related traffic would generally be for a two-year period (Table 2.7-1). Changes to traffic types and patterns could increase the potential for traffic-related conflicts due to the Proposed Project (e.g., construction-related traffic) as well as other users of the road, whether they be residents, or motorized and non-motorized transportation users. (However, as described under Section 3.22.5 above, it is assumed that recreation-related trips would effectively be replaced by construction worker trips during the construction period, which helps to limit traffic increases resulting from the Proposed Project.) Changes in the level of traffic and types of traffic-related conflicts may affect both the response time and the frequency of calls requiring emergency response.

The Proposed Project includes an Emergency Response Plan that addresses transportation-related emergency concerns (e.g., emergency access and response), while a final Emergency Response Plan, with additional details, would be required from the construction contractor (Appendix B: *Definite Plan – Appendix O4*). The Proposed Project considers how emergency access and response would be provided during the time of construction activity and how it would be coordinated with the contractor's Health and Safety Plan, Spill Prevention and Response Plan and Fire Management Plan. (Appendix B: *Definite Plan – Appendices O1 through O4*.) Emergency response is also discussed in Section 3.17 *Public Services* and Section 3.21 *Hazards and Hazardous Materials*, which address impacts related to emergency response providers as well as

the risk of increased hazards such as wildfires and adequate access for abating wildland fires. Implementation of Recommended Measure TR-1 would require additional details and procedures to be put in place to help prevent incidents, to ensure preparedness in the event incidents occur, and to provide a systematic and orderly response to emergencies through coordination with emergency response agencies, as described in Appendix B: *Definite Plan – Appendix O4*, which would render potential traffic and transportation impacts of the Proposed Project to levels similar to baseline conditions. However, because wildfires can spread at a rapid speed and involve high risks, any amount of additional response time compared with existing conditions could result in a substantial increased risk of loss, injury, or death involving wildland fires and this would be a significant impact.

Overseeing development and implementation of the final Emergency Response Plan, including the aforementioned additional details in Recommended Measure TR-1, does not fall within the scope of the State Water Board's water quality certification authority. While the KRRC has stated its intention to reach enforceable "good citizen" agreements that will be finalized and implemented, at this time the Emergency Response Plan is not finalized and the State Water Board cannot require its implementation. Accordingly, the State Water Board anticipates that implementation of the final Emergency Response Plan, including the aforementioned additional details in Recommended Measure TR-1 and any modifications developed through the FERC process that provide the same or better level of protection for transportation and traffic, would reduce impacts to less than significant. Since the State Water Board cannot ensure the Emergency Response Plan's implementation, it has determined the impact in this Draft EIR to be significant and unavoidable.

Significance

Significant and unavoidable impact

Potential Impact 3.22-5 Construction-related activities could potentially substantially conflict with public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities resulting in an increased risk of harm to the public.

Short-term impacts to public transit, bicycle, or pedestrian facilities would result in an increased risk of harm to the public if construction-related activities substantially decrease the safety of such uses utilizing the roadways within the Area of Analysis. The Proposed Project includes measures to minimize both vehicular and non-vehicular transportation-related conflicts through a Traffic Management Plan (as analyzed in Potential Impact 3.22-1 and 3.22-2). As described in Section 3.22.2.5 *Public Transit*, there is minimal public transit, including bus service, rail service, or airports in the Area of Analysis. Construction-related traffic conflicts could occur where there is an occasional bicyclist or pedestrian using the roadways or when public transportation, including school bus traffic, is using the same roads as construction-related traffic. There is no information available on existing pedestrian or bicycle facilities. A review of Google Earth and Street View (2018) indicated the general absence of sidewalks and bike paths, and no information is available on the amount of bicycle or pedestrian use. Bicyclist or pedestrian use would be subject to a decrease in the performance and safety of the roadways utilized by the Proposed Project during construction activities, resulting in a potentially substantial increased risk of harm to the public, which would be a significant impact.

The Proposed Project includes management strategies in the draft Traffic Management Plan that would identify areas where pedestrians and cyclists could potentially share roads with construction vehicles. KRRC's contractor will install appropriate signage to notify both construction vehicle drivers and non-motorized users of each other's potential presence on the roads. If an unacceptable level of risk to non-motorized users is deemed to persist, KRRC's contractor will arrange appropriate detours to allow continued movement for such users (Appendix B: Definite Plan – Appendix O2). The Traffic Management Plan would be further developed by KRRC working with the appropriate agencies through the FERC process. KRRC also proposes that KRRC and the appropriate state and local agencies would work together to develop recommended terms and conditions that should be adopted by FERC as conditions of approval for the Lower Klamath Project. This is consistent with FERC's preference for licensees to be "good citizens" of the communities in which projects are located and thus to comply, where possible, with state and local requirements.

It would be appropriate for the recommended terms and conditions relating to traffic and transportation to include Recommended Measure TR-1 as part of the detailed design phase and prior to start of construction. Recommended Measure TR-1 includes additional components beyond those listed as part of the Proposed Project and would ensure that potential short-term construction-related impacts on the safety of all users of the roadways within the Area of Analysis would be less than significant.

Overseeing development and implementation of the final Traffic Management Plan does not fall within the scope of the State Water Board's water quality certification authority. While the KRRC has stated its intention to reach enforceable "good citizen" agreements that will be finalized and implemented, at this time the Traffic Management Plan is not finalized and the State Water Board cannot require its implementation. Accordingly, the State Water Board anticipates that implementation of the final Traffic Management Plan, including any modifications developed through the FERC process that provide the same or better level of protection for Transportation and Traffic resource would reduce impacts to less than significant. However, because the State Water Board cannot ensure the Traffic Management Plan's implementation, it has determined the impact in this Draft EIR to be significant and unavoidable.

Significance

Significant and unavoidable impact

Potential Impact 3.22-6 The Proposed Project would not potentially result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.

Impacts to air traffic could result if the Proposed Project requires a change in flight paths or an increase in flights, resulting in substantial safety risks. There are no airports within two miles of the work area or that would be affected by the Proposed Project. The location of the Proposed Project (away from existing airports) and the short-term duration of construction activities, would not require a change in flight paths or an increase in flights that would result in substantial safety risks. Helicopters may be used for hydroseeding during restoration activities or in response to an emergency (medical, fire), but this would not alter air traffic patterns at any nearby airport. As a result there would be no significant impact.

Significance

No significant impact

3.22.6 References

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